

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

**JACK STEPHEN PURSLEY,
AKA STEVE PURSLEY**

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NO. 4:18-CR-575 (HUGHES)

UNITED STATES' AMENDED EXHIBIT LIST

PRESIDING JUDGE: Hon. Lynn N. Hughes	PLAINTIFF'S ATTORNEY: DOJ TAX Trial Attorneys Sean Beaty, Grace Albinson, and Jack Morgan	DEFENDANT'S ATTORNEY: Victor Vital, Nicole LeBeouf, Alicia Barrs Raines
TRIAL DATE(S):	COURT REPORTER:	COURTROOM DEPUTY:

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
1-3					4/6/1999 Certificate of Incorporation of Southeastern Shipping
1-3A					4/6/1999 Certificate of Incorporation of Southeastern Shipping (TRANSLATION)
1-6					9/19/2001 Certificate of Incorporation for Southeastern Shipping Company Ltd.
1-7					9/24/2001 Engagement Letter between SES and Venerabile
1-8					11/1/2006 Certificate of Incorporation for Pelhambridge Ltd.
1-9					3/6/2007 Stock Purchase Agreement Between Gulf States Management Corp. and S. Mooney for \$900,000
1-11					9/30/2007 Minutes of Special Meeting of Directors for Diversified Land Holdings, Inc. Resolving to Purchase 100,000 Shares in Gulf States
1-12					10/20/2007 Minutes of Special Meeting of Directors for Diversified Land Holdings, Inc. Resolving to Purchase 50,000 in Gulf States
1-13					10/22/2007 Stock Sale Agreement between Diversified Land Holdings, Inc. and Pelhambridge Ltd. for \$960,000
1-14					10/31/2007 Minutes of Meeting of the Board of Directors of Pelhambridge Ltd.
1-15					11/1/2007 Wire transfer detail for \$961,000
1-16					11/1/2007 Wire transfer detail for \$960,000
1-17					11/5/2007 \$250,000 Wire transfer from Gulf States Management Corporation to S. Pursley
1-23					1/15/2008 Stock Sale Agreement between Diversified Land Holdings, Inc. and Pelhambridge Ltd.
1-24					2/12/2008 Minutes of Meeting Pelhambridge Ltd. Board of Directors

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
1-25					2/29/2008 Wire Transfer Detail for \$875,000 from Southeastern Shipping to Isle of Man Trust
1-26					2/29/2008 Wire Transfer Detail for \$875,000 from Isle of Man Trust to Diversified Land Holdings
1-27					8/10/2008 Pelhambridge Limited IOMFT Know Your Client with S.Mooney as Beneficial Owners
1-28					9/9/2008 Minutes of Meeting of Pelhambridge Ltd. Board of Directors, re Opening of Royal Bank of Scotland Int'l Ltd. Account with S.Mooney as Beneficial Owner
1-29					3/4/2009 Stock Sale Agreement between Diversified Land Holdings, Inc. and Pelhambridge Ltd. for \$900,000
1-30					3/4/2009 Minutes of Meeting of Pelhambridge Ltd. Board of Directors for \$900,000
1-31					4/12/2009 Representation Agreement between The Pursley Law Firm, PLLC and S. Mooney
1-32					4/24/2009 Invoices for T. Foster
1-34					6/3/2009 Minutes of Meeting Southeastern Shipping Company Ltd. Board of Directors
1-35					5/9/2009 Memorandum from T. Foster to S. Pursley re: SES
1-36					6/10/2009 Confidential Memorandum from S. Mooney to Management and Administrators of Southeastern Shipping Company Ltd. and Isle of Man Trust Limited, Re. S. Pursley Authority
1-37					6/10/2009 Confidential Memorandum from E. Venerabile to Management and Administrators of Southeastern Shipping Company Ltd. and Isle of Man Trust Limited, Re. S. Pursley Authority
1-38					6/25/2009 IOMFT Know Your Client Form and Documents- S. Mooney
1-39					6/30/2009 Limited Partnership Agreement of Recruitment Partners, L.P.
1-40					8/1/2007 Minutes of Diversified Land Holdings Board of Directors, Re: Sale of 120,000 Shares of Stock to Pelhambridge
1-42					7/24/2009 Private Placement Memorandum for Four Sevens Investment Corp.
1-43					7/30/2009 Letter from E. Venerabile to the Directors of Southeastern Shipping Company Ltd., Re: Distribution for \$3,625,000
1-44					7/30/2009 Subscription Agreement for \$3,625,000 between Four Sevens Investment Corp. and Australian Partners Holding Corp. PTY Ltd.
1-47					8/25/2009 IOMFT Know Your Client Form - Pelhambridge (E. Venerabile)
1-49					8/27/2009 Email from S. Pursley to C. Gillis, Re: Instructions for \$3,625,000 transfers

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
1-50					8/28/2009 Wire transfer detail for \$3,625,000 from Southeastern Shipping Company Limited to C. Gillis PLLC IOLTA
1-51					9/22/2009 File Note re: Southeastern Shipping Limited & Pelhambridge Ltd.
1-54					10/16/2009 - Land Title Guarantee Company Settlement Statement for 1600 Colorow Road
1-55					10/16/2009 Promissory Note between S. Mooney and Diversified Land Holdings for \$1,600,000 for Purchase of 1600 Colorow Road
1-56					1/28/2010 Private Placement Memorandum for American Real Estate Properties
1-58					6/4/2010 Promissory Note for \$3,900,000 between AREP Ritz Partners, LLC and American Real Estate Properties, Inc.
1-59					6/7/2010 Promissory Note for \$500,000 between Pursley Interests, LLC and Four Sevens Investment Corp.
1-61					6/25/2010 Email from M. Sternfield to S. Dorman re: 2610 Arosa Dr.
1-63					7/12/2010 Private Placement Memorandum for Global American Properties, Inc.
1-67					8/2/2010 Wire Transfer Detail for \$852,117
1-68					8/3/2010 Settlement Statement for 2610 Arosa Drive
1-69					8/3/2010 Disbursement Statement for 2610 Arosa Drive
1-71					9/22/2011 Check from Pursley Interests to S. Pursley for \$222,000
1-72					10/25/2011 Letter of Authorization Form for Charles Schwab & Co. Inc. (x1072) - Gulf States Management Corp.
1-73					10/25/2011 Letter Authorization Form for Wire Transfers for Charles Schwab & Co. Inc. (x7149) - Four Sevens Investment Corp.
1-78					12/30/2013 LLC Operating Agreement of Arosa JV, LLC
1-79					1/14/2014 Assignment and Transfer \$910,000 Promissory Note from Four Sevens Investment Corporation to Arosa JV, LLC
1-80					Account Application for Southwest Securities Inc. (X0040) - S. Pursley
1-82					Agreement for Participating Interest between Pursley Interests, LLC and American Real Estate Properties, Inc. for \$300,000
1-83					7/17/2010 Subscription Agreement between Global American Properties, Inc. and Australian Partners Holding Corporation PTY Ltd.
1-84					Charles Schwab (x1072) - Gulf States Management Corporation - Statement 2011 (Oct.)
1-85					Charles Schwab & Co. (x7149) - Four Sevens Investment Corporation - Statement 2011 (Oct.)
1-86					Charles Schwab (x1072) - Gulf States Management Corporation - Statement 2007 (Nov.)

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
1-88					Charles Schwab & Co. Inc. (x1072) Gulf States Management Corporation - Statement 2012 (Dec.)
1-89					Charles Schwab (x1072) - Gulf States Management Corp. - Statement 2012 (Dec.)
1-90					Chase (x9401) - Gulf States Management Corporation - Statement 2007
1-91					Chase (x940-1) - Gulf States Management Corporation - Statement 2008
1-92					Account Application for E-Trade Securities LLC (X4096) - S. Pursley
1-94					E-Trade Securities LLC (x4096) - S. Pursley - Statement 2011 (Oct.)
1-95					E-Trade Securities LLC (x4096) - S. Pursley - Statement 2011 (Oct.)
1-96					May 2009 S. Pursley Plane Ticket to Isle Of Man
1-97					Notes re Script for K. Smith Meeting with E. Venerabile
1-99					Prosperity Bank (x1147) - S. Pursley - Statement 2013 (Feb.)
1-100					Royal Bank of Scotland International, Isle of Man Branch (x7806) Southeastern Shipping Company Ltd. - Statement 2007
1-101					Royal Bank of Scotland International, Isle of Man Branch bank (x7806) - Statement 2008
1-102					Royal Bank of Scotland International, Isle of Man Branch (x7806) Southeastern Shipping Company Ltd. - Statement 2009
1-103					Royal Bank of Scotland International, Isle of Man Branch (x7806) Southeastern Shipping Company Limited - Statement 2010
1-104					Royal Bank of Scotland International, Isle of Man Branch bank (x7806), Southeastern Shipping Company Limited - Statement 2010
1-105					Royal Bank of Scotland International, Isle of Man Branch (x7806) Southeastern Shipping Company Limited - Statement 2010
1-106					Royal Bank of Scotland International, Isle of Man Branch (x4836) - Pelhambridge Limited - Statement 2008
1-107					Royal Bank of Scotland International, Isle of Man Branch bank (x4836) - Pelhambridge Limited - Statement 2008
1-108					Royal Bank of Scotland International, Isle of Man Branch bank (x4836) - Pelhambridge Limited - Statement 2009
1-109					Sanford C. Bernstein & Co., LLC (3314) - Four Sevens Investment Corporation - Statement 2009
1-110					Sanford C. Bernstein & Co., LLC (x3359) - Four Sevens Investment Corporation - Statement 2009
1-111					Sanford C. Bernstein (x9166) - Four Sevens Investment Corporation -Statement 2010
1-112					Sanford C. Bernstein (x9166) - Four Sevens Investment Corporation - Statement 2010 (June)

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
1-113					Sanford C. Bernstein (x9166) - Four Sevens Investment Corporation - Statement 2010 (August)
1-126					Southwest Securities Inc. (x7448) - Four Sevens Investment Corp. - Statement 2012 (Dec.)
1-127					Southwest Securities Inc. (x0040) - S. Pursley - Statement 2012 (Dec.)
1-129					Subscription Agreement between American Real Estate Properties, Inc. and Australian Partners Holding Corporation PTY Ltd.
1-131					Washington Mutual Bank (940-1) - Gulf States Management Corporation - Statement 2007 (Nov.)
1-132					Washington Mutual Bank (563-0) - Gulf States Management - Statement 2007 (Nov.)
1-133					Washington Mutual Bank (940-1) - Gulf States Management Corporation - Statement 2008 (March)
1-135					Wells Fargo Bank (x8312) Diversified Land Holdings Inc. - Statement 2008 (February)
1-136					Wells Fargo Bank (x8312) Diversified Land Holdings Inc. - Statement 2008 (March)
1-137					Wells Fargo Bank, N.A. (x8312) Diversified Land Holdings Inc. - Statement 2009 (March)
1-140					Wells Fargo Bank, N.A. (x8312) - Diversified Land Holdings Inc. - Statement 2007 (November)
1-142					Wells Fargo Bank, N.A. (x8312) Diversified Land Holdings Inc. - Statement 2009 (October)
1-145					Wells Fargo Bank, N.A. (x9822) Charles Michael Gillis PLLC IOLTA Account – Statement 2009 (August)
1-148					Wells Fargo Bank, N.A. (x4315) American Real Estate Properties Inc. – Statement 2010 (March)
1-162					3/30/2018 J. Pursley Deposition Transcript, Ex. 2 (6/4/2009 Email from K. Smith to Pursley)
1-163					Mooney Certified Travel Records
1-164					Pursley Certified Travel Records
1-167					3/30/2018 J. Pursley Deposition Transcript, Ex. 7 (4/12/2009 Representation Agreement)
1-169					3/30/2018 J. Pursley Deposition Transcript, Ex. 9 (7/25/2005 KPMG Memo)
2-7					10/3/2007 Letter from A.Thomas to "Director Pelhambridge Ltd" re: \$2.5 Million Loan Facility
2-10					12/3/2008 Client Review Form: Pelhambridge Limited
2-22					5/27/2009 Isle of Man Financial Trust Limited File Note From: K. Smith re: Southeastern Shipping Limited
2-27					1/28/2009 Fax from A. Mellor to S. Mooney re: Southeastern Shipping Co. Ltd & Pelhambridge Ltd
2-29					6/10/2009 Email from K. Smith to A. Mellor re: SES
2-30					9/28/2009 Email from K. Smith to T. Duncan re: NFR

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2-31					5/27/2009 Email from K. Smith to A. Thomas re: Southeastern Shipping.
2-32					5/28/2009 Email from K. Smith to A. Mellor re: Tel Con-SSES
2-34					9/15/2009 Emails between A. Mellor, K. Smith, & Tracy Duncan: re: SES
2-42					6/21/2011 Email from S. Pursley to A. Mellor re: E. Venerabile Transfer of Funds
2-43					6/22/2011 Email from E. Venerabile to A. Mellor re: Money Transfer to E. Venerabile
2-51					7/10/2010 Email from S. Pursley to A. Mellor re: Instruction for Request
2-54					1/18/2010 Letter from A. Mellor to S. Pursley re: Pelhambridge Limited (the "Company")
2-55					10/2/2007 Pelhambridge Limited Meeting Minutes
2-62					7/16/2012 Email from E. Venerabile to A. Mellor re: Let me know when you are back.
2-65					8/6/2012 22:02 Email from E. Venerabile to A. Mellor re: New Wire transfers
2-68					9/13/2010 IOMA Telephone Conference Form from Pursley re: Reduction in Consultancy Fee to E. Venerabile
2-69					2/29/2008 Inter Account Transfer Confirmation for \$875,000
2-70					Payment Search Summary: 3/20/2009 Payment for \$900,000
2-71					9/9/2008 Minutes of Meeting Pelhambridge Ltd. Board of Directors, 9/9/2008 Engagement Letter, and Terms and Conditions
2-73					4/3/2012 Minutes of Meeting Pelhambridge Ltd. Board of Directors
2-75					IOMFTL Know Your Client Form - S. Pursley
2-78					10/31/2007 Minutes of Meeting Pelhambridge Ltd. Board of Directors & 10/22/2007 Stock Sale Agreement
3-3					11/18/2010 Email from A. Mellor to S. Pursley re SES Management Accounts, and attached Financial Documents
3-4					10/19/2011 Email from E. Venerabile to S. Pursley re: Fwd. Invoices
3-8					4/10/2012 Email from A. Mellor to C. Gillis re: Pelhambridge Loan Write-Off
3-12					5/24/2012 Email from A. Mellor to E. Venerabile re: Any News, with Loan Agreement between Pelhambridge Ltd. and Venerabile
3-13					7/16/2012 Email from A. Mellor to E. Venerabile re: Let me know when you are back
3-16					8/20/2012 Email from A. Mellor to E. Venerabile re: Southeastern Shipping Co. Ltd. / Dividend
4-8					4/28/2009 Handwritten Notes re: "Chuck"
4-14					4/23/2009 Handwritten Notes re: "Mtg"
4-15					Undated Handwritten Notes

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4-42					To-Do List w/Handwritten Notes
4-44					Handwritten Notes: "IOM"
4-45					Handwritten Notes "Review Docs: Philipp. & Accident"
4-54					Handwritten Notes: "Action - Operations/Protection w/EFV"
4-60					Handwritten Notes: "Kerry - Disc. Plan Tues. 6/9/09"
4-69					6/18/2007 Draft Letter from M.Dean to N.Tebay re: Isle of Man Employment Company Restructuring Ownership
4-73					5/7/2007 Email from S. Mooney to S. Pursley re: Company Names
4-78					2/27/2007 Waiver Agreement between S. Pursley and S. Mooney
4-81					4/20/2009 Letter from S. Pursley to S. Mooney re: Clarifications Regarding Status of Corporate Activity.
4-111					8/22/2009 Email from S. Pursley to S. Mooney re: Confirmation
4-117					8/26/2009 Email from K. Smith to S. Pursley re: Formalities of Ownership
4-118					8/26/2009 Email from K. Smith to S. Pursley re: Trip
4-120					9/6/2009 Email from S. Mooney to E. Venerabile re: Our Trip?
4-124					8/28/2009 Email from A. Mellor to S. Pursley re: Payment Transfer
4-172					8/21/2009 Email from S. Pursley to E. Venerabile, re: Confirmation
4-175					Handwritten notes - "5/2009 Form Acqu. Entity"
4-176					5/20 Notes
4-178					8/2/2009 Handwritten Notes - "Summary Mtg EFV"
4-187					BSI SES Account - Form A
4-187A					BSI SES Account - Form A (TRANSLATION)
4-191					7/2/2009 Handwritten Notes re "Chuck" - Discussion re: Formation of Australian Corporation
4-193					S. Mooney Tax/OVD Penalty Payment Checks
4-194					05/26/2007 Pursley Law Firm Letter to S. Mooney
5-3					Ratification of Corporate Governance and Administrative Actions Undertaken by Officers and Directors of Southeastern Shipping Co. Ltd.
5-14					6/15/2009 Email from E. Venerabile to S. Pursley re: Miscellaneous
5-15					Ratification and Indemnification of Corporate Actions of Southeastern Shipping Co. Ltd. for the Formation and Ownership of Pelhambridge Ltd.
5-18					8/8/2011 Email from E. Venerabile to Steve@Internationalrecruitmentcorp.com re: Enc. Money Transfer to E. Venerabile
5-22					8/21/2012 Email from G. Glover to E. Venerabile re: APHC and Southeastern Dividends
5-24					1/20/2010 Email from A. Mellor to S. Pursley re: Invoices

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5-25					2/2/2013 Email from E. Venerabile to S. Mooney re: Enc. Two documents attached
5-26					Waiver Agreement between S. Pursley and E. Venerabile
5-27					Stock Purchase Agreement between E. Venerabile and Australian Partners Holding Corp. Pty Ltd.
5-28					8/11/2011 Note from E. Venerabile to Steve re: request to Mellor for wire transfers
5-29					8/5/2011 Note from E. Venerabile to Steve re: Invoices for IOMA services for June and May 2011
5-30					10/30/2012 Handwritten Notes re: T/C, CMG, Andrew, EFV
5-32					1/24/2012 Email to S. Pursley and S. Mooney re: Following Up
5-43					8/10/2009 Email from S. Pursley to E. Venerabile, re: Another Document
5-44					11/13/2009 Email from S. Pursley to E. Venerabile, re: Agreement Attached for Your Review and Response
5-47					9/26/2009 Pelhambridge Consulting Agreement, Signed by TC.James, T.Duncan
5-48					9/26/2009 Pelhambridge Consulting Agreement, Signed by E. Venerabile
5-49					2/1/2012 Email from E. Venerabile to C. Gillis, A. Mellor, re: Australian Partners Holding Corp.
6-2					Documents Provided by S. Pursley & S. Mooney
6-3					York & Hines Billing Sheet for S. Mooney
7-1					7/2/2009 Registration of Australian Partners holding Corporation Pty. Ltd.
7-4					2/18/2014 Application for Voluntary Deregistration of a Company: Australian Partners Holding Corp
8-4					5/7/2009 Email from T. Foster to S. Pursley re: Tax and Ownership Issues
8-8					5/15/2009 Email from T. Foster to S. Pursley re: FBAR reporting and liquidation issues
8-9					5/8/2009 Email from T. Foster to S. Pursley re: Draft Attached
8-16					5/7/2009 Memorandum from T. Foster to S. Pursley re SES Ownership
9-7					Note from S. Pursley to C. Gillis, Contains 5/9/2009 Memo from T.Foster to S. Pursley re: Southeastern Shipping Company Ltd.
9-13					5/7/2009 Email from S. Pursley to C. Gillis, Atch. re: SES Acq.; 4/30/2009 Stock Purchase Agreement re: Acquisition Partners Ltd with Draft Signed by E. Venerabile Attached
9-58					8/7/2009 Email from C. Gillis to S. Pursley, S. Mooney re: Advisement Ltr. Re: Advisement Letter 7/30/2009
9-117					3/8/2010 Email from C. Gillis to A. Miller, M. Coughtrey and E. Venerabile re: Request for Dividend Distribution/Southeastern Shipping Company Limited

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
9-118					7/25/2010 Email from C. Gillis to A. Miller, M. Coughtrey and E. Venerabile re: Request for Dividend Distribution - Southeastern Shipping Company Limited
9-129					2/4/2013 Email from C. Gillis to S. Pursley re: Australian Partners
9-132					7/28/2010 Email from C. Gillis to S. Mooney and S. Pursley re: Transfer of Funds
9-147					11/4/2009 Opinion Letter from C. Gillis to S. Pursley re: Federal Income Tax Consequences of Receipt of Payment in Exchange for Issuance of Common Stock
9-148					6/25/2010 email from S. Pursley to C. Gillis re: formation of Arosa Partner, LLC
10-2					2007 Gulf States Management Corp. Work papers
12-9					11/5/2007 Promissory Note: S. Pursley to Gulf States Mgmt. Corp
12-40					7/8/2009 letter from S. Pursley to K. Smith re: Follow-up items requested
12-45					8/5/2009 Email from K. Smith to S. Pursley re: Southeastern Shipping
13-1					9/2001 Account Opening Documents for SES Account x7806
13-2					9/2008 Account Opening Documents for Pelhambridge
14-1					6/6/2010 AFI Investments, LLC New Member Acknowledgement for Pursley Interests LLC
15-25					Bratcher Handwritten Notes
15-33					9/4/2013 Email from S. Pursley to J. Ortega, re: re: Tax Statements for Four Sevens and JS Pursley
17-1					2010 Form 1120 Corporation Income Tax Return - American Real Estate Properties Inc.
17-21					2009 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-22					2010 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-23					2011 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-24					2012 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-25					2013 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-28					2016 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-40					2010 Form 1120 Corporation Income Tax Return - Global American Properties Inc.
17-48					2007 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.
17-49					2008 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.
17-50					2009 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.

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17-51					2010 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.
17-53					2012 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.
17-54					2013 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.
17-62					2007 Form 1040 Individual Tax Return - S. Mooney
17-63					2008 Form 1040 Individual Tax Return - Processed - S. Mooney
17-65					2010 Form 1040 Individual Tax Return - Processed - S. Mooney
17-82					2007 Form 1040 - Individual Income Tax Return - S. Pursley
17-83					2008 Form 1040 - Individual Income Tax Return - S. Pursley
17-84					2009 Form 1040 - Individual Income Tax Return - S. Pursley
17-85					2010 Form 1040 - Individual Income Tax Return - S. Pursley
17-86					2011 Form 1040 - Individual Income Tax Return - S. Pursley
17-91					2013 Form 1040 - Individual Income Tax Return - S. Pursley
18-1					S. Pursley COBRA Payment Records
18-2					S. Pursley COBRA Plan Payment Schedule
19-1					10/1/2010 Email from S. Pursley to R. Armour re: Follow-up Contact Info
19-2					2011 Checks from Arosa Partners to R. Armour
19-3					2011 to 2013 Account Statement for the 2610 Arosa Dr. Property
21-1					5/18/2015 Infinisource Welcome Letter to S. Pursley
21-3					2015 Checks from the Pursley Foundation to Infinisource
26-8					Four Sevens Investment Corporation: State Corporate Records
35-1					8/1/2010 Promissory Note from Arosa Partners LLC to Four Sevens Investment Corp from Arosa Partners, LLC
36-1					Summary Ex. - Step 1: Transfers of Funds from Isle of Man to United States
36-2					Summary Ex. - Step 2: Gulf States Management Corp.
36-3					Summary Ex. - Step 3: Step 3: Four Sevens Investment Corp.
36-4					Summary Ex. - Step 4: Pursley Interest, LLC
36-5					Summary Ex. - Global Publishing Corporation
36-6					Summary Ex. - Transfers Through Gillis IOLTA Account
36-8					Summary Ex. - 2007 Flow of Funds
36-9					Summary Ex. - S. Mooney: Unreported Income
36-10					Summary Ex. - S. Mooney: Total Unreported Income
36-11					Summary Ex. - S. Mooney: Total Tax Due and Owing
36-12					Summary Ex. - J. Pursley: Unreported Income
36-13					Summary Ex. - J. Pursley: Total Unreported Income
36-14					Summary Ex. - J. Pursley: Total Tax Due and Owing
36-15					Summary Ex. - Bank Account Signatories
36-16					Summary Ex. - Traced Transfers: 2007-2014

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200-5					Wells Fargo (x2328) - Recruitment Partners, LP - Account Statements - 2009
200-6					Wells Fargo (x2328) - Recruitment Partners, LP - Account Statements - 2010
200-7					Wells Fargo (x2328) - Recruitment Partners, LP - Account Statements - 2011
200-9					Wells Fargo (x2328) - Recruitment Partners, LP - Account Statements - 2013
200-12					Wells Fargo (x2328) - Recruitment Partners, LP - Addendum to Certificate of Authority
200-13					Wells Fargo (x2328) - Recruitment Partners, LP - 8/29/2011 Check to Four Sevens Investment Corp. for \$230,000
200-14					Wells Fargo (x2328) - Recruitment Partners, LP - 4/15/2013 Withdrawal Slip for \$416,000
200-15					Wells Fargo (x2328) - Recruitment Partners, LP - 1/17/2011 Check for \$970,000 to Four Sevens Investment Corp.
201-2					Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - 9/13/2010 Check to Global American Properties for \$3,898,500
201-4					Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - Account Statements - 2009
201-5					Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - Account Statements - 2010
201-7					Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - Account Application
201-8					Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - 7/28/2010 Withdrawal Slip for \$3,898,875
201-9					Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - 3/16/2010 Withdrawal Slip for \$3,900,000
202-3					Wells Fargo (x74265) - Global American Properties Inc. - Account Statements - 2010
202-5					Wells Fargo (x74265) - Global American Properties Inc. - Business Account Application
203-3					Wells Fargo (x4315) - American Real Estate Properties Inc. - Business Account Application & Signature Card
203-4					Wells Fargo (x4315) - American Real Estate Properties Inc. - Account Statements - 2010
206-1					Wells Fargo (x38312) - Diversified Land Holdings Inc. - Account Statements - 2007
206-2					Wells Fargo (x38312) - Diversified Land Holdings Inc. - Account Statements - 2008
206-3					Wells Fargo (x38312) - Diversified Land Holdings Inc. - Account Statements - 2009
206-10					Wells Fargo (x38312) - Diversified Land Holdings Inc. - Business Account Application
218-1					Prosperity Bank (x10300) - Texas Equal Access to Justice Foundation - Checks & Deposit Tickets

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
218-3					Prosperity Bank (x10300) - Texas Equal Access to Justice Foundation - Account Statements - 2008
218-4					Prosperity Bank (x10300) - Texas Equal Access to Justice Foundation - Signature Card
218-5					12/23/2008 Check for \$60,000 from Charles Schwab
220-1					Prosperity Bank/First Bank (x01147) - Jack Pursley - Account Statements - 2012
220-2					Prosperity Bank/First Bank (x01147) - Jack Pursley - Account Statements - 2013
220-3					Prosperity Bank/First Bank (x01147) - Jack Pursley - Signature Card
221-2					Smart Financial Credit Union (x0290/0300) - Arosa Partners LLC - Account & Deposit Statements - 2011
222-3					Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account & Deposit Statements - 2011
222-4					Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account & Deposit Statements - 2012
222-5					Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account & Deposit Statements - 2013
222-6					Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account & Deposit Statements - 2014
222-8					Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account Application, Signature Card, and Certificate of Formation
222-10					Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 1/18/2011 Check to Four Sevens Investment Corp. for \$100,000
222-11					Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 12/30/2013 Check to the Pursley Foundation for \$200,000
222-12					Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 2/15/2014 Check to Arosa JV LLC for \$20,000
222-13					Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 12/5/2011 Deposit Slip & Check from Four Sevens Investment Corp for \$200,000
222-14					Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 4/20/2013 Deposit Slip & Check from Four Sevens Investment Corp. for \$416,000
222-15					Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 2/27/2012 Check to S. Pursley for \$60,000
224-1					Smart Financial Credit Union (0370/0380) - Pursley Interests, LLC - Account Application, Signature Card, and Certificate of Filing
224-2					Smart Financial Credit Union (0370/0380) - Pursley Interests, LLC - Account & Deposit Statements - 2010
224-3					Smart Financial Credit Union (0370/0380) - Pursley Interests, LLC - Account & Deposit Statements - 2011

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
225-2					Southwest Securities (x7448) - Four Sevens Investment Corporation - Account Closure & Transfer Letter (12/17/2012)
225-3					Southwest Securities (x7448) - Four Sevens Investment Corporation - Account Opening Documents
225-4					Southwest Securities (x7448) - Four Sevens Investment Corporation - Account Statements - 2011
225-5					Southwest Securities (x7448) - Four Sevens Investment Corporation - Account Statements - 2012
226-2					Southwest Securities (x0040) - Jack S. Pursley - Account Opening Application & Signature Card
226--3					Southwest Securities (x0040) - Jack S. Pursley - Account Statements (Dec. 3, 2012 to Dec. 31, 2012)
229-1					Sanford Bernstein & Co (x 3314) - Four Sevens Investment Corp. - Account Application & Signature Card
229-3					Sanford Bernstein & Co (x 3314) - Four Sevens Investment Corp. - Account Statements (8/31/2009)
230-2					Sanford Bernstein & Co (x3359) - Four Sevens Investment Corp. - Account Statements (8/31/2009)
231-1					Sanford Bernstein & Co (x9166, x3314, x3359) - Four Sevens Investment Corp. - Account Statements - 2009
231-2					Sanford Bernstein & Co (x9166, x3314, x3359) - Four Sevens Investment Corp. - Account Statements - 2010
235-2					E-Trade (x4096) - Jack S. Pursley - Account Opening Doc
235-3					E-Trade (x4096) - Jack S. Pursley - Account Statements - 2011
237-1					Washington Mutual Bank (x1563-0) - Gulf States Management Corp. - Account Agreement
237-2					Washington Mutual Bank (x1563-0) - Gulf States Management Corp. - Account & Deposit Statements - 2007
237-3					Washington Mutual Bank (x1563-0) - Gulf States Management Corp. - Account & Deposit Statements - 2008
238-1					Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - Account Agreement
238-2					Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - Account & Deposit Statements - 2007
238-3					Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - Account & Deposit Statements - 2008
238-10					Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - Transfer Order Details
238-11					Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - 11/5/2007 Transfer for \$340,000
241-1					Charles Schwab (x 1072) - Gulf States Management Corp. - Account Application

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
241-10					Charles Schwab (x 1072) - Gulf States Management Corp. - Account Statements - 2007
241-11					Charles Schwab (x 1072) - Gulf States Management Corp. - Account Statements - 2008
241-14					Charles Schwab (x 1072) - Gulf States Management Corp. - Account Statements - 2011
241-15					Charles Schwab (x 1072) - Gulf States Management Corp. - Account Statements - 2012
241-17					Charles Schwab (x 1072) - Gulf States Management Corp. - 12/14/2012 Check Order Form
241-18					Charles Schwab (x 1072) - Gulf States Management Corp. - 10/25/2011 Transfer Order Form for \$812,076
248-1					Charles Schwab (x 7149) - Four Sevens Investment Corp. - Account Application
248-2					Charles Schwab (x 7149) - Four Sevens Investment Corp. - 2/26/2011 Letter of Authorization for Wire Transfer to RBC Capital Markets for \$500,000
248-4					Charles Schwab (x 7149) - Four Sevens Investment Corp. - Account Statements - 2010
248-5					Charles Schwab (x 7149) - Four Sevens Investment Corp. - Account Statements - 2011
248-8					Charles Schwab (x 7149) - Four Sevens Investment Corp. - 8/30/2011 Letter of Authorization for Wire Transfer to Wells Fargo Bank for \$416,000
248-9					Charles Schwab (x 7149) - Four Sevens Investment Corp. - 10/25/2011 Letter of Authorization for Wire Transfer to E-Trade for \$1,395,785.61
253-1					Fidelity (x3549) - The Pursley Foundation - Account Application
253-4					Fidelity (x3549) - The Pursley Foundation - Account Statements - 2014
253-9					Fidelity (x3549) - The Pursley Foundation - Checks - Received & Issued
254-1					Scottrade (x8343) - Arosa JV, LLC - Brokerage Account Application
254-3					Scottrade (x8343) - Arosa JV, LLC - Account Statements - 2014
271-3					RBC (x0755) - Four Sevens Investment Corp. - Client Agreement and Approval Form
271-4					RBC (x0755) - Four Sevens Investment Corp. - Advisor Client Agreement
271-5					RBC (x0755) - Four Sevens Investment Corp. - Account Statements - 2011
286-4					Land Title Guarantee - 8/2/2010 Wire Transfer in Receipt, \$852,117.23
286-6					Land Title Guarantee - 6/25/2010 View An Incoming Wire, \$50,000

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
286-7					Land Title Guarantee - 8/2/2011 View An Incoming Wire, \$852,117.23
286-8					Land Title Guarantee - 6/25/2010 Wire Transfer in Receipt, \$50,000
350-1					Demonstrative – Plan 1
350-2					Demonstrative – Plan 2
350-3					Demonstrative – Plan 3
350-4					Demonstrative – Plan 4
350-5					Summary of Four Sevens' Tax Returns (2009 - 2013)
350-5A					Summary of Four Sevens' Tax Returns (2009 - 2012)
350-5B					Summary of Four Sevens' Tax Return (2013)
350-6					Summary of Gulf States' Tax Returns (2007 - 2013)
350-6A					Summary of Gulf States' Tax Return (2007)
350-6B					Summary of Gulf States' Tax Returns (2008 - 2012)
350-6C					Summary of Gulf States' Tax Return (2013)
350-7					Summary of Pursley's Tax Returns (2007 - 2013)
350-7A					Summary of Pursley's Tax Return (2007)
350-7B					Summary of Pursley's Tax Returns (2008 - 2012)
350-7C					Summary of Pursley's Tax Return (2013)
350-9					Demonstrative - Mooney's and Pursley's Travels (1999 - 2001)
350-10					Demonstrative - Mooney's Payments to IRS
350-11					Demonstrative – Gulf States Valuation
350-12					Demonstrative – Total Money Moved to the U.S. and Pursley Entities

As discussed at the parties' August 22, 2019 pretrial conference, this list includes the exhibits that the United States intends to use in its case-in-chief at trial. The United States may seek to use additional documents listed on its previous exhibit list (Dkt. 116) depending on the facts and arguments presented by the defense at trial.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will serve a copy of this document on all counsel of record.



Sean Beaty
Trial Attorney, Tax Division